

EXHIBIT C

Cowley, Steven M.

From: Edelstein, Lindsay <lre@msk.com>
Sent: Thursday, December 9, 2021 3:27 PM
To: Cowley, Steven M.; Lackman, Eleanor
Cc: Chen, Peggy S.; Mullins, Bradley
Subject: RE: [EXTERNAL] Activity in Case 1:21-cv-03514-AT-JLC Tom Hussey Photography, LLC v. BDG Media, Inc. Order

Steven,

Maybe there is a miscommunication here. Is this a technical issue? Are you not able to see the confidentiality designations written on the documents?

Defendant contends that all documents it marked with confidentiality designations are implicated by the Court's Order. If you're having trouble viewing the designations on the documents themselves, please let us know.

Your response regarding the timing of the draft does not respond to the point, and we will proceed on separate tracks between the settlement agreement and resolving the issue regarding the designations.

Regards,
Lindsay



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From: Cowley, Steven M. <SMCowley@duanemorris.com>
Sent: Thursday, December 9, 2021 12:15 PM
To: Lackman, Eleanor <eml@msk.com>
Cc: Chen, Peggy S. <PSC Chen@duanemorris.com>; Mullins, Bradley <bym@msk.com>; Edelstein, Lindsay <lre@msk.com>
Subject: RE: [EXTERNAL] Activity in Case 1:21-cv-03514-AT-JLC Tom Hussey Photography, LLC v. BDG Media, Inc. Order

-EXTERNAL MESSAGE-
Counsel,

We have identified all the designated documents we are aware of. I asked you to identify any other document you contend is applicable. You refuse. And, oddly, point out that it is not burdensome to provide a substantive response. Yet you still refuse. Please, do whatever you need to do, our question remains outstanding.